

# Better Days Safeguarding Policy

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# Acronyms

SGP	Safeguarding Policy
BD	Better Days
UASC	Unaccompanied Asylum-Seeking Children
PSEA	Protection from Sexual Exploitation and Abuse
UNCRC	United Nations Convention on the Rights of the Child
H&S	Health and Safety
PSS	Psychosocial Support
CV	Curriculum Vitae
GDPR	General Data Protection Regulation
M&E	Monitoring and Evaluation

## Policy Overview

Better Days' mission is to build positive spaces that guarantee access to quality education and life-changing opportunities for displaced children and young adults. Our practices are rooted in the principles of safety, respect, and care, ensuring that our actions never cause harm, but instead foster trust, confidence, and promote the well-being of the program participants and team members.

This policy outlines how Better Days fulfils its commitment to safeguarding children and young adults by ensuring the safety, empowerment and building resilience of displaced adults, youth and children participating in its programs. We are dedicated to delivering assistance in ways that safeguard, empower, and uphold the dignity of every individual.

Any misconduct of the policy undermines BD's mission and programming and erodes trust in the communities where we work.

## Definition of Safeguarding

Safeguarding entails taking all reasonable steps to protect anyone (adults and children) involved in providing or receiving humanitarian assistance from harm, abuse, or exploitation. It requires both proactive measures to minimize risks (prevention) and well-defined procedures (reporting) to ensure an appropriate response when harm occurs (response). Better Days' safeguarding policy covers adult and child safeguarding by including forms of harassment, exploitation, and abuse, including sexual violence (PSEA standards). Moreover, it includes the safeguarding policy for the workplace.

## Scope

The Safeguarding Policy applies in all contexts (physical and digital) and at all times where Better Days participants, staff, volunteers, partners, visitors and contractors are present, during and outside working hours.

All Better Days community working with vulnerable people holds a fundamental duty to protect them from harm, including all types of abuse and sexual exploitation, with special considerations and rules for children, to uphold human dignity and ensure data privacy.

Safeguarding is an organizational commitment and responsibility for all members of the Better Days community. This applies to:

3. **All Better Days staff and associates**, including full-time and part-time employees, interns, consultants, volunteers, and Board members
4. **All Better Days partners and contractors**, including downstream partners, suppliers, and any other entities under contract
5. **All visitors** to Better Days programs and activities, including donors, supporters, ambassadors, and representatives of partner organizations.

## Policy Purpose

The purpose of this policy is to:

- **Protect program participants and members of the Better Days community**, particularly children and young people, including both unaccompanied and accompanied asylum-seeking children & youth, from harm, abuse, and exploitation.
- **Set clear standards of behaviour and professional boundaries**, ensuring they are widely communicated, understood, and upheld across the organization.
- **Establish roles and responsibilities for safeguarding**, ensuring accountability at all levels, and promoting a safe and transparent organizational culture.
- **Provide context, guidance, and accessible mechanisms** for recognising, reporting, and responding to safeguarding concerns in a timely, survivor-centred, and consistent manner.
- **Define safeguarding misconduct and appropriate actions**, including administrative, disciplinary, or other measures to address breaches.

## Principles

Better Days is committed to key principles that guide its work and pledges to uphold them in all interactions with the Better Days community and those who benefit from its services. By adhering to these principles, we ensure the safest possible environment for everyone involved.

**Equality and Respect:** We believe that all individuals are equal and have the same rights and entitlement to access resources, regardless of their background. This principle ensures that assistance and opportunities are offered equitably, without discrimination, and in full respect of human rights, thereby upholding human dignity.

**Diversity and Inclusion:** Diversity acknowledges the full range of human differences, including age, gender, ability, culture, and other characteristics. Inclusion means intentionally creating environments where people of all backgrounds feel respected, valued, and able to participate fully in decision-making and access support.

This includes people with disabilities and individuals with diverse Sexual Orientations, Gender Identities, Gender Expressions, and Sex Characteristics (SOGIESC).

**Do No Harm:** All assistance and services provided by Better Days are designed to ensure that they do not unintentionally cause additional harm to individuals or communities.

**Best Interests of the Child:** In line with Article 3 of the United Nations Convention on the Rights of the Child (UNCRC), Better Days prioritises the physical, emotional, and psychological well-being, safety, and development of children in all decisions and actions. Upholding the best interests of the child includes involving them in decision-making wherever possible and considering the impact of every decision on the child.

**Inter-Agency Standing Committee (IASC) Core Principles for Sexual Exploitation and Abuse:** Better Days adopts the **IASC Six Core Principles**, which include:

- Survivor-centred approaches
- Safe recruitment practices
- Accessible reporting mechanisms
- Provision of quality support to survivors
- Accountability measures
- Promoting a culture of safeguarding

**Survivor-Centred Approach:** We create supportive environments where the rights of survivors are upheld, and they are treated with dignity and respect. This approach places the survivor's needs and preferences at the centre of all actions, programs, and policies, prioritising their recovery through compassionate and appropriate support.

**Person-Centred Approach:** This approach recognises individuals as active participants in their own recovery and prioritises their dignity, agency, and protection throughout all interactions and services.

**Accountability:** Better Days ensures that all services are delivered with dignity and designed to protect individuals from harm. Accountability is maintained through transparent communication, effective feedback mechanisms, and empowering communities to participate in decision-making.

**Confidentiality:** All information collected is safeguarded and shared only with those who need it to perform their roles. Confidentiality is maintained for all victims and survivors of safeguarding violations, though it has limits, particularly when children are at risk, or when adults demonstrate intent to harm themselves or others.

## Commitment & Positive Safeguarding Culture

Better Days is committed to safeguarding and promoting the safety, dignity, and well-being of all children, young people, and adults at risk involved in its programmes and activities. Safeguarding is a core organizational responsibility and is embedded across all areas of our work.

Guided by the UNHCR Safeguarding Fundamental Rights framework and a rights-based, person-centred approach, Better Days upholds a **zero-tolerance policy** toward all forms of abuse, exploitation, neglect, and harassment. Safeguarding is a shared responsibility, and all staff, volunteers, partners, and associates are required to uphold this policy and act at all times in the best interests of programme participants.

Better Days actively promotes a **positive safeguarding culture** grounded in respect, professionalism, accountability, and healthy boundaries. We recognise that safeguarding extends beyond physical safety and includes the creation of **safe, inclusive, and trauma-informed environments** that support psychosocial well-being, healing, learning, and personal development.

All spaces in which Better Days operates are designed to be participant-safe, confidential, and welcoming. Staff and associates are expected to model safeguarding-appropriate behaviour, communicate calmly and respectfully, maintain clear boundaries, and foster a sense of belonging. Participants are supported through predictable, transparent processes that encourage trust, autonomy, and meaningful engagement.

Better Days is committed to empowering participants, respecting their rights to choice and dignity, and ensuring that safeguarding concerns can be raised safely and responded to promptly, ethically, and in line with organizational policies.

Better Days does not investigate complaints that are unrelated to its programmes or operations. However, any concern involving the safety, welfare, or protection of a child or adult at risk will be taken seriously and immediately reported to the appropriate authorities and relevant safeguarding actors.

## Definitions

- **Child:** A child is defined as anyone under the age of 18, in line with the **United Nations Convention on the Rights of the Child** (1989).
- **Adult at-risk:** An *adult at risk* is someone over the age of 18 who, due to physical, social, economic, environmental, or other factors, may be more vulnerable to abuse, exploitation, or other harm.
- **Youth:** Refers to individuals aged 15 to 24 who access services for support. Within this group, it is helpful to distinguish between teenagers (13–19) and young adults (20–24), as capacities and developmental needs may vary significantly.
- **Harm:** Harm refers to any detrimental effect on a child or young person's physical, emotional, mental, or social well-being, whether temporary or long-term, resulting from abuse, neglect, exploitation, or unsafe environments.
- **Abuse:** Any act or omission involving physical, emotional, psychological, economic, or sexual violence, or neglect, that causes or is likely to cause harm to an individual's health, development, or dignity, and that occurs within a context of power imbalance. This includes, but is not limited to, physical abuse, emotional abuse, sexual abuse, exploitation, neglect, and bullying. When the victim is under 18, such actions are classified specifically as **child abuse**, but the principles and responses apply to all vulnerable individuals regardless of age.

**Physical Abuse:** Non-accidental physical harm, such as hitting, shaking, burning, suffocating, poisoning, or fabricating illness.

**Emotional/Psychological Abuse:** Persistent emotional mistreatment that adversely affects an individual's emotional development or mental health. This includes rejection, humiliation, intimidation, isolation, threats, or exposing someone to the abuse of others. Age- or developmentally-inappropriate expectations and degrading language or behavior are also forms of emotional abuse.

**Sexual Abuse:** Any sexual activity that is forced, coerced, or exploitative involving a child, youth, or adult at risk. This includes contact acts such as rape, sexual assault, molestation, or other inappropriate sexual touching, as well as non-contact acts such as exposure to sexual material, voyeurism, or grooming. All team members must maintain a duty of care and **never** engage in sexual relationships with those they support, which are always abusive and unacceptable.

**Sexual Exploitation:** Taking advantage of a person's vulnerability, trust, or a situation of power imbalance for sexual purposes. This includes profiting monetarily, socially, or politically from the sexual exploitation of others. Sexual exploitation of a person under the age of consent is a **criminal offence** and considered sexual abuse.

**Bullying:** Deliberate, repeated harmful behavior that is difficult for the victim to defend against. This includes physical (hitting, theft), verbal (name-calling, threats, slurs), and emotional (exclusion, intimidation, microaggressions) abuse.

**Commercial exploitation:** Using a person, especially a child or vulnerable adult, in labour or activities for the benefit of others at the cost of their physical, mental, educational, or social well-being. This includes forced labour and trafficking.

**Neglect:** Failure to meet a person's basic physical, emotional, or developmental needs, causing harm or risk of harm. This includes lack of food, shelter, medical care, supervision, or emotional support.

**Institutional abuse:** Abuse or neglect that occurs within an institution, perpetrated by staff, representatives, or systemic practices that exploit positions of authority or influence. This abuse arises from an abuse of power and often manifests psychologically, and may be difficult to detect due to normalization or systemic acceptance within the setting.

**Online abuse:** Harmful behavior through digital platforms, including cyberbullying, harassment, exploitation, grooming, doxxing, or exposure to harmful content.

**Digital safety** involves protecting privacy, personal data, and vulnerable users online.

**Discriminatory abuse:** Mistreatment based on identity or characteristics such as race, gender, religion, disability, sexual orientation, age, or nationality. It can be verbal, physical, emotional, or systemic.

**Human trafficking:** The coercive or deceptive recruitment, transportation, or exploitation of individuals, often for forced labour or sexual exploitation.

**Child Marriage:** Child marriage involves formal or informal unions where at least one party is under 18. Regardless of legal status under national law, child marriage is treated as a safeguarding concern due to the significant risks it poses to children's rights, health, safety, and well-being.

These definitions provide a common understanding to guide our safeguarding practices, ensuring clarity and consistency in protecting the rights, dignity, and well-being of all children, youth, and adults at risk we serve.

# Safeguarding Misconduct

Better Days has a **zero-tolerance policy** towards any form of abuse by anyone who works for, or is associated with, the organization in any capacity. Safeguarding misconduct includes behaviours that are

**NON-Negotiable**, towards both children and adults, and should be reported following the Complaints & Incidents Procedure. The prohibited behaviours mentioned below concern everyone.

- Use or solicit the services of sex workers, regardless of national or local laws.
- Request, demand, or accept sexual favors from anyone in exchange for any benefit, service, or support.
- Engage in intimate or romantic relationships with program participants, whether consent is present or not.
- Make unwanted or inappropriate sexual remarks or gestures, including behaviors like whistling.
- Engage in any form of unwanted physical contact.
- Attempt to or engage in any sexual touching without consent, including kissing, fondling, or groping.
- Commit or attempt any form of physical assault or physical abuse.
- Use threatening, harassing, abusive, sexually explicit, suggestive, or demeaning language or behavior toward adults.
- Promise, request, demand, or accept any type of favor (financial, sexual, or otherwise) in exchange for services, employment opportunities, or other benefits.
- Show favoritism toward or discriminate against adult participants, including offering favors that may appear preferential.
- Employ or influence adult participants to work in personal or domestic roles.
- Reveal or threaten to reveal someone's sexual orientation or gender identity without their explicit consent.
- Use offensive, discriminatory, or degrading language toward people with disabilities or toward individuals from different racial or ethnic backgrounds.
- Use digital platforms to send or share threatening, bullying, harassing, or abusive messages, images, or content.
- Connect with program participants through personal social media accounts, either by sending or accepting requests.
- Reveal private, confidential, or personal information or images online or via social media.
- Share images of program participants or any other members of the Better Days community without consent or without respecting the key principles of Better Days.
- Utilize online platforms, artificial intelligence, or other technologies to commit any form of harm prohibited by this Policy.

## Child Safeguarding

Better Days' work is grounded in the principles of the United Nations Conventions for the Protection of Human Rights and Fundamental Freedoms and on the Rights of the Child (UNCRC). In addition to the above-mentioned safeguarding misconduct, the following behaviours constitute safeguarding misconduct for children (people under 18):

- Participate in any form of sexual activity with a child, whether the child is a Better Days participant or not.

- Access or possess child sexual abuse material in any form.
- Participate in, encourage, or force child marriage, regardless of cultural practices or local legislation.
- Inflict emotional or psychological harm on a child, including actions that shame or humiliate them.
- Use language or behavior toward children that is threatening, abusive, harassing, bullying, sexually suggestive, explicit, or otherwise demeaning.
- Carry out intimate or personal tasks for children that they can perform independently (e.g., dressing, using the toilet).
- Have unsupervised contact with a child outside approved program activities.
- Ask, employ, or encourage a child to perform personal tasks or labour, regardless of local laws.
- Form inappropriate personal relationships with children, including sending private social media or phone messages.

# Safeguarding Framework: Prevention, Reporting, and Response

Safeguarding at Better Days is grounded in **prevention**, **reporting** and appropriate **response** to safeguarding concerns or misconduct, ensuring that adults and children at risk are protected from harm and treated with dignity at all times. Better Days' approach prioritizes autonomy, consent, and each individual's right to self-determination, while maintaining a clear duty to act when necessary to prevent harm. Better Days promotes a positive safeguarding culture by committing to place the needs and best interests of program participants at the centre of all actions, and by ensuring that all practices and decisions respect and uphold the human rights of all individuals.

## Roles & Responsibilities

### **Executive Advisor:**

The Executive Advisor holds ultimate accountability for safeguarding at Better Days. This includes ensuring that safeguarding policies and procedures are in place and effectively implemented, roles and responsibilities are clearly defined, and adequate safeguarding capacity is built and maintained across the organization. The Executive Advisor is responsible for oversight of serious safeguarding incidents and external reporting, where required.

### **Safeguarding Committee:**

The Safeguarding Committee is composed of the Executive Advisor and the Senior Quality and Impact Advisor, and is responsible for providing guidance and oversight on safeguarding matters, supporting and advising Safeguarding Focal Points, and leading or overseeing safeguarding investigations, including complex or serious cases. The Committee ensures that investigations are conducted in a timely, fair, and survivor-centred manner and that appropriate actions and recommendations are made.

### **Safeguarding Focal Points:**

Safeguarding Focal Points are responsible for raising awareness within the communities Better Days works with, particularly regarding available reporting mechanisms; building the capacity of staff on safeguarding in general and on Better Days' safeguarding policies and procedures in particular; receiving and documenting safeguarding concerns; maintaining confidential safeguarding records; and supporting safeguarding processes in coordination with the Safeguarding Committee. Safeguarding Focal Points participate in investigations as deemed appropriate by the Safeguarding Committee.

**Senior Team members:** The Executive Advisor, the Directors of the organisation and the CFO are considered as Senior team members. They can be involved in the investigation and decision-making.

### **Managers:**

Managers are responsible for fostering and maintaining a culture of safeguarding prevention; ensuring that team members under their supervision comply with safeguarding training requirements; providing appropriate supervision of staff and premises; and acting promptly on any safeguarding concerns brought to their attention.

### **Team Members:**

All team members at Better Days are responsible for completing required safeguarding training, maintaining a safeguarding-aware mindset, and promptly reporting any safeguarding concerns or incidents to the Safeguarding Focal Points or through the available reporting mechanisms. Safeguarding is the responsibility of all staff, volunteers, consultants, and representatives of Better Days.

## **Prevention**

Better Days takes all necessary actions to prevent incidents of safeguarding misconduct and to ensure the safety, dignity, and protection of all people associated with the organization, including staff, volunteers, partners, contractors, and members of the Better Days community. These measures are based on international good practices, as outlined below:

### **Safe Recruitment**

Better Days follows defined recruitment processes, to mitigate the chances of abuse and/or improper behaviour, which include:

- Staff and volunteers must be academically qualified to perform their duties and meet the position's requirements, and have a substantial amount of experience in their area of work
- Applicants must submit a clean criminal record certificate
- Applicants must provide two references from recent employers
- There is a two-stage interview process ensuring that candidates are vetted and suitable for the environment of operations.
- All new staff will complete a 3-month probation period

### **Training**

- All new team members receive **comprehensive safeguarding online and in-person trainings** during orientation and induction.
- Existing staff and volunteers receive annual **refresher training on the Safeguarding Policy**.

### **Team Members**

- All staff and volunteers are made aware of Better Days' Safeguarding Policy and the organization's commitment to protecting the safety and dignity of all programme participants.
- They must **agree to and sign the Employee/Volunteer Handbooks, which include clear references, links, and abstracts from the Safeguarding Policy** during their orientation and induction. They are also made aware of and agree to comply with additional relevant policies, including:
  - [Non-Discrimination Policy](#)
  - [Confidentiality and Data Protection](#)
  - [Code of Conduct](#)
  - [Communication Materials Policy](#)
- All staff and volunteers have access to **safeguarding reporting procedures** through the Employee/Volunteer Handbooks, Safeguarding Policy and the [Safeguarding Guidelines](#).
- Information about reporting mechanisms is made available in multiple languages via **posters, information, education and communications materials, and other communication channels**, ensuring that everyone can report concerns safely and effectively.

## Partners, Contractors and Visitors

- All partners, contractors and visitors are made aware of Better Days' Safeguarding Policy, and agree to comply with it during onboarding. Additionally, the Safeguarding Policy and Complaint & Incident Form are publicly available through the organization's website.
- In case a partner does not have a Safeguarding Policy, Better Days shares the safeguarding policy and protocols until the partner can establish their own.

## Better Days Program Participants

- All Better Days participants and their guardians are made aware upon induction and through the signing of the Student Bundle and/or Guardian Consent, of the Safeguarding Policy and Code of Conduct, and they receive awareness on safeguarding and how to raise concerns
- Participants and their guardians are made aware of the **reporting channels** of a safeguarding concern during their induction meeting upon registration, and additionally through posters regarding Safeguarding Misconduct, reporting channels and procedures, which are accessible in different languages

## Policies and reporting procedures

- Better Days has clear reporting mechanisms regarding safeguarding concerns and clear SOPs regarding the response to safeguarding incidents, guided by its key principals. See [Complaints & Incidents Procedure](#).
- The organization has established a regular monitoring and feedback mechanism, which incorporates questions regarding safeguarding concerns.
- The organization has put in place additional policies that complement the Safeguarding Procedure:
  - **Parent/Guardian Consent Form:** All children must be accompanied by their parent or legal guardian during registration, and a Parent/Guardian Consent Form must be signed for each child. For any activities conducted outside of Gekko premises, such as community events, parents or guardians will be fully informed of all relevant details and are required to sign a Field Trip Permission Form to authorize their child's participation.
  - **Media, Communications, and Privacy Standards:** Better Days is committed to upholding the privacy, dignity, and safety of all participants when using media or sharing information as outlined in the [Communication Materials Policy](#) and [Privacy Statement](#)
- The organization respects participants' rights to be informed, to make informed decisions, and to be supported throughout their engagement, including through clear communication, appropriate transitions, and continuous support.
  - **Informed consent** is obtained by the participant and/or their guardian, prior to the provision of services, interventions, or the collection and processing of personal data. This is a fundamental safeguarding measure that upholds dignity, autonomy, transparency, and respect.
  - Depending on the project and services provided, participants may be required to review and sign relevant documentation, including: **Communications Materials Release Form**, governing the collection and use of images and other media, **Data Consent Declaration**, in line with Better Days' Privacy Statement, and any additional documentation necessary to inform participation and support shared decision-making.

# Reporting

Despite all preventive measures, abuse can still happen; therefore, a solid system must be in place to respond. As such, all Better Days' staff and associates are obligated to report any witnessed, verbally communicated, suspected or alleged cases of safeguarding misconduct, including child abuse or exploitation by any member of the Better Days community.

At all times during the reporting process and subsequent actions, Better Days is committed to:

1. Ensuring the safety, well-being, dignity and best interests of the participant
2. Taking every report of abuse seriously
3. Ensuring that all parties are treated fairly
4. Ensuring all procedures are transparent and in line with the law. In cases of **abuse**, Better Days will follow the mandatory reporting (in case of children) and the local law, which includes referring all suspected situations of abuse to the **police and/or guardians**.
5. Dealing with abuse reports in a confidential and timely manner, always keeping in mind the protection of the affected person, the reporter and the alleged perpetrator.

**Everybody must take responsibility and care for what happens in the programs they work on. If abuse, or other concerns or protection issues are suspected, witnessed, reported, or disclosed, the staff/volunteer receiving the concern must act immediately to secure the participant's safety.**

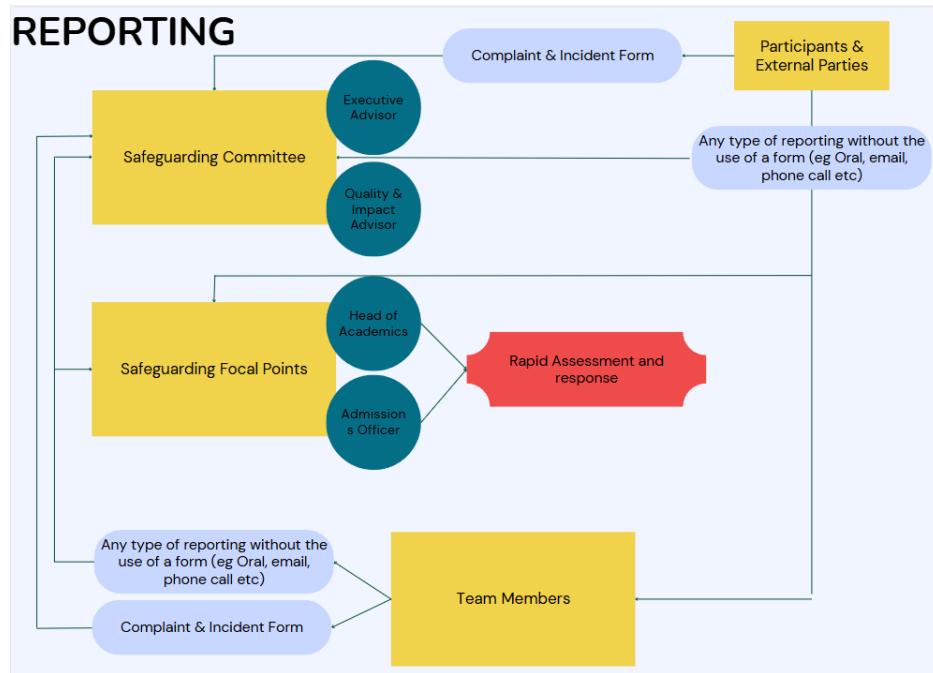
## Reporting Channels

Complaints and incidents may be reported through any of the following channels:

- **Online Complaint & Incident Form**, available on the Better Days website
- **Better Days phone line**: +30 694 725 4824 (for verbal or written/text reports)
- **Email**: [compliance@betterdays.ngo](mailto:compliance@betterdays.ngo)
- **In person**, by reporting directly to a staff member, manager, or Safeguarding Focal Points

## Reporting Tools

Better Days uses a **Complaint & Incident Form** (available internally via SurveyMonkey and externally on the website) to report all incidents, workplace grievances, and whistleblowing concerns. All staff, volunteers, and implementing partners are expected to complete the form accurately, objectively, and in detail. The same form is also used by program participants and external parties to submit complaints or report concerns.

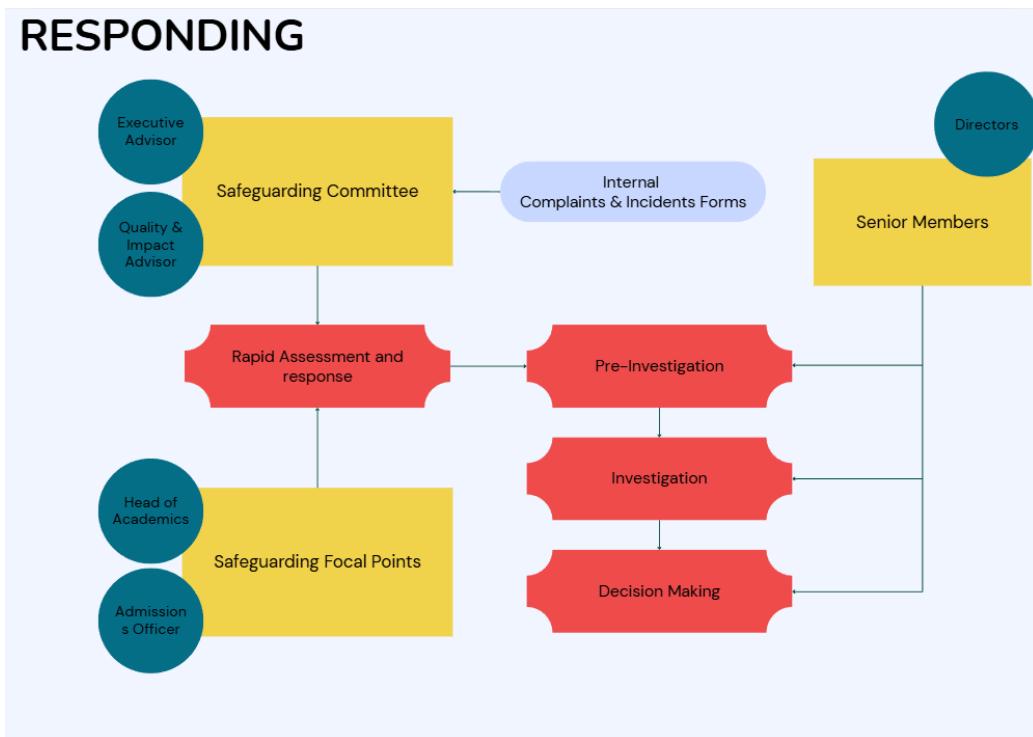


## Special Considerations

Better Days adopts a person- and survivor-centred approach, prioritising individuals' choices and supporting them in a way that upholds their dignity.

- Individuals who experience or witness a safeguarding violation have the right to choose whether they want to report it, seek support, or proceed with the investigation.
- When investigating a concern, the investigation should be focused on what actually matters in that situation, and ensure the person most affected has a say in how it is done.
- Better Days' staff and volunteers who are disclosed with information involving an adult survivor must obtain the survivor's **written or verbal informed consent** before submitting a report on their behalf.
- However, reporting is **mandatory** in all cases involving children. An appointed team member of the Safeguarding Committee will be responsible for contacting the child's family (or guardian) and informing them of the incident and assistance provided, in alliance with the guidelines provided in the Complaint & Incident Procedure.
- In the event of a disclosure, Better Days staff and volunteers should move to a safe, private space where confidentiality can be maintained, create a supportive environment, and communicate with the individual in a calm, respectful, and reassuring manner.(See Appendix III - How to handle a disclosure).

# Respond



**BD's Complaints & Incidents Procedure** determines the steps that need to be taken when receiving an Incident report or a Complaint. These include:

- A Rapid Assessment is conducted by the Safeguarding Committee to determine protective actions that need to be taken and the severity of the risk of harm. In case of incidents addressed on the ground in the presence of the Safeguarding Focal points and where actions are necessary to be determined on the spot for the safety of those involved, the Rapid Assessment document is filled in retrospectively.
- An Investigation is conducted by the Investigation Body to gather further information and, if necessary, a referral to relevant authorities.
- An Investigation Report is generated
- The Decision Body concludes on the Action Plan

• The Investigation Body and Decision Body can include members of the Safeguarding Committee, Safeguarding Focal Points or Senior Members, depending on the nature and the severity of the incident.

• During any investigation, the alleged person will be prevented from any further unsupervised access to participants and will be fully informed of their rights. The allegation may represent poor practice that needs to be considered under internal disciplinary procedures.

• As part of the Rapid Assessment and/or during the whole process, a Safeguarding Focal Point on the ground assesses the support and assistance required by the survivor (child or adult). Better Days will ensure the survivor receives appropriate assistance, both within and outside the organization, through direct support and/or referrals. A Safeguarding Focal Point will be designated to manage referrals and ensure accessibility of services, with the aim of maintaining safety and protecting the survivor from

further abuse.

- A mapping of all relevant services, such as medical and, psychosocial support, legal aid, child protection services, local authorities services and pathways is available and updated. The Safeguarding Committee and Safeguarding Focal Points need to be aware of them.

## Monitor and Review

Everything mentioned in this document will remain effective as long as its practices are reviewed annually and monitored to ensure that they are still relevant to the projects and participants. The review and redesign should occur at any time it is identified that a change is required. The review must consider the opinions and concerns of the team. Records of SG incidents reported throughout the year will be evaluated annually as part of the monitoring and evaluation process and submitted for review during the Management Review.

- The use of the [\*\*SG Internal Audit checklist\*\*](#) by the Senior Quality & Impact Advisor or delegate to assess internal organizational gaps in safeguarding and protection. The audit is conducted annually and is submitted for review during the Management Review.
- **Risk Assessment Guidance** (Appendix 1): how to adapt existing risk management tools to include SGP risks
- **Safe Working Practices, which includes** [\*\*Burnout and Resiliency Tool\*\*](#) covering effective self-management tips to reduce secondary trauma by identifying good practices to prevent and recognise burnout. This section includes self-evaluation tools to assess Burnout and Resilience.

## Document Guidance

- [SG Internal Audit Checklist](#)
- [Burnout and Resilience Tool](#)
- [Complaints & Incidents Procedure](#)
- [Accessibility reporting pathways](#)
- [Complaint & Incident Form](#)
- [Employee Handbook](#), also see:
  - [Non discrimination Policy](#)
  - [Confidentiality and Data Protection](#)
  - [Employee Code of Conduct](#)
  - [Volunteer Handbook](#)
  - [Staff Recruitment Procedure](#)
  - [Volunteer Recruitment Procedure](#)
- [Communications Consent Form](#)
- [Communications Material Policy](#)
- [Data Consent Declaration](#)
- BD's [Privacy Statement](#)
- [SG risk assessment exercise](#)

# Appendix 1 - SG Risk Assessment

Better Days adopts a thorough SG risk management strategy, which includes conducting a risk assessment exercise before commencing any program or conducting any new activity or event which involves participants. Better Days' SG risk management mechanism includes:

1. Identifying risks (i.e. detecting the potential for something to happen that will have an impact on participants, staff, volunteers and associates, or Better Days as an organization);
2. Assessing the risks (i.e. evaluating the likelihood and level of impact)
3. Mitigating the risk (i.e. developing strategies to minimise or address the risk, reducing the likelihood of harm and abuse from actually occurring, clearly assigning responsibilities in the mitigation strategy)
4. Regularly reviewing risks and mitigation strategies, especially when conditions/contexts change.

# Appendix 2: Recognizing Signs of Abuse

Team members at Better Days may encounter signs that suggest someone is experiencing abuse or neglect. While a single indicator is not necessarily cause for concern, repeated signs or patterns of behavior may warrant further attention. These signs should be considered in context, including personal history and communication with relevant caregivers or professionals.

It is not the role of staff or volunteers to investigate or diagnose. Physical examinations should only be conducted by medical professionals, and no one should ever be pressured to reveal their body in an educational or support setting.

## Warning signs may include:

- **Unexplained or suspicious injuries:** Injuries that cannot be adequately explained, are inconsistent with the individual's account, or do not align with their developmental stage or daily activities. This may include repeated injuries, injuries in various stages of healing, or injuries located in areas typically covered by clothing.
- **Sudden changes in mood, behavior, or performance:** Noticeable shifts such as withdrawal, depression, irritability, loss of motivation, or a decline in academic or work performance. These changes may occur abruptly and persist over time without an obvious external cause.
- **Excessive compliance or aggression:** Overly compliant, submissive, or "people-pleasing" behavior that may indicate fear of repercussions, as well as heightened aggression, defiance, or hostility that can reflect distress, trauma, or attempts to regain control.
- **Signs of fear, anxiety, or distress:** Persistent nervousness, hypervigilance, panic responses, sleep disturbances, or visible discomfort around certain individuals, environments, or activities. The individual may appear unusually fearful of authority figures or reluctant to be left alone with specific persons.

- **Risk-taking behavior or addiction:** Engagement in harmful or high-risk behaviors, including addictive behaviors (such as alcohol, drugs, or other compulsive activities), self-harm, unsafe sexual behavior, or other actions that may function as coping mechanisms for emotional distress, trauma, or prolonged exposure to abuse.
- **Sexualized behavior or language inappropriate for age or context:** Use of explicit sexual language, knowledge, or behaviors that are not developmentally appropriate, particularly in children, or behaviors that suggest exposure to sexual content or experiences beyond what would be expected for the individual's age or circumstances.

If concerns arise, follow BD's safeguarding procedures to ensure timely and appropriate support

## Appendix 3: How to handle a case of disclosure

When an individual (child or adult) discloses harm, how we respond can have a lasting impact on their well-being, sense of safety, and willingness to seek support. The following principles guide Better Days staff and volunteers in responding appropriately and sensitively.

- **Listen carefully and reassure** the person. Do not make promises or commitments that cannot be kept, and avoid formally interviewing them. Only gather necessary, relevant facts if clarification is needed, using neutral prompts such as *Who, What, Where, and When*, avoiding *Why*, which can feel accusatory. Reassure the affected person that they are doing the right thing by speaking up and always repeat or check our understanding of the situation.
- Maintaining **emotional control** and **calmness** is crucial. The professional's reaction matters greatly, as disclosures may include difficult or distressing information. Staying calm, empathetic, and non-judgmental helps support their trust and safety. Instead of showing shock, anger, or disgust, team members should acknowledge the courage it takes to share such experiences. It is important to avoid criticism, disbelief, or questions like "*Why didn't you tell us earlier?*" The affected person may already feel guilty; make it clear that they are not responsible for the harm done to them.
- Ensure **privacy** by encouraging the participant to speak in a safe, private room or space, making sure no one else is present or listening unless necessary for safety.
- Recognize that participants may feel afraid or unsure about revealing information. To manage these doubts, team members must **reassure** them that speaking up is the right thing to do.
- Critical comments should be avoided. Children and young adults often blame themselves or feel they need to defend their actions. In cases of abuse or neglect, it's vital to reassure them that they are not to blame or responsible for what happened.

- **Recording and reporting** must be prompt. It is important to write down exactly what the participant said, using their own words as much as possible, including the date, time, location, and names of those involved. Disclosures should be reported immediately to the designated safeguarding focal point and/or through the reporting mechanisms. Written or verbal **informed consent** should be obtained from the survivor if an adult before reporting. Reporting is **mandatory** in all cases involving children.
- **Avoid making promises** about confidentiality. Team members must understand their limits and the difficulty of the situation, which may require involving others. Under no circumstances should it be promised that the discussion will be kept secret.
- It is important to inform the participant about **what will happen next**. Knowing what to expect helps reduce anxiety and gives them a sense of control. For example: *"Thank you for telling me. I'm really glad you did. I can't keep this a secret because I want to make sure you're safe. I'm going to talk with someone whose job is to help kids in situations like this, and we'll do it together."*
- If an **interpreter** is involved, ensure they understand the importance of translating the participant's exact words without filtering or altering meaning. Reassure the participant that the interpreter is there to help communicate accurately.

This process must always be approached with care, empathy, and professionalism. Team members should remember that how they respond can significantly impact the participant's trust, healing, and access to further protection.

#### What to Say vs. What Not to Say

✓ Say This	✗ Don't Say This
"Thank you for telling me. That was very brave."	"Why didn't you tell someone sooner?"
"I'm here to listen and help keep you safe."	"Are you sure this really happened?"
"It's not your fault. You didn't do anything wrong."	"What did you do to make them do that?"
"I'm going to talk to someone who can help us. You are not alone."	"Don't worry, I won't tell anyone."
"I understand this is really hard to talk about."	"That's so terrible, I can't believe it!"
"You're doing the right thing by speaking up."	"This is so upsetting. I don't know what to do."